

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STAR AUTO SALES OF BAYSIDE, INC.  
(d/b/a STAR TOYOTA OF BAYSIDE), STAR  
AUTO SALES OF QUEENS, LLC (d/b/a STAR  
SUBARU), STAR HYUNDAI LLC (d/b/a  
STAR HYUNDAI), STAR NISSAN, INC. (d/b/a  
STAR NISSAN), METRO CHRYSLER  
PLYMOUTH INC. (d/b/a STAR CHRYSLER  
JEEP DODGE), STAR AUTO SALES OF  
QUEENS COUNTY LLC (d/b/a STAR FIAT)  
and STAR AUTO SALES OF QUEENS  
VILLAGE LLC (d/b/a STAR MITSUBISHI),  
Plaintiffs,

-against-

VOYNOW, BAYARD, WHYTE AND COMPANY,  
LLP, HUGH WHYTE, RANDALL FRANZEN AND  
ROBERT SEIBEL,  
Defendants.

Civil Action No.:  
1:18-cv-05775 (ERK) (TAM)

**DECLARATION OF MAUREEN P.  
FITZGERALD**

Maureen P. Fitzgerald, Esquire, pursuant to 28 U.S.C. § 1746 and Local Civil Rule 1.10  
of the United States District Court for the Eastern District of New York, declares as follows:

1. I am a member of Marshall Dennehey, P.C., counsel of record for Defendants,  
Voynow, Bayard, Whyte and Company, LLC, Hugh Whyte, Randall Franzen, and Robert Siebel  
(collectively, “Defendants” or “Voynow”).

2. I submit this declaration in support of Defendants, Voynow, Bayard, Whyte and  
Company, LLP, Hugh Whyte, Randall Franzen, and Robert Seibel’s Response in Opposition to  
Plaintiffs’ Objections and Motion to Set Aside Portions of The Hon. Taryn A. Merkl’s December  
13, 2023 Order.



MAUREEN P. FITZGERALD, ESQUIRE

Dated: January 9, 2024  
LEGAL/158567818.v1